IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF DELAWARE

VEHICLE IP, LLC,

Plaintiff,

v.

AT&T MOBILITY LLC, CELLCO PARTNERSHIP, GARMIN INTERNATIONAL, INC., GARMIN USA, INC., NETWORKS IN MOTION, INC., TELECOMMUNICATION SYSTEMS, INC., TELENAV INC., UNITED PARCEL SERVICE, INC., and UPS LOGISTICS TECHNOLOGIES, INC.,

C.A. No. 09-1007-LPS

Defendants.

STIPULATED MOTION AND [PROPOSED] ORDER FOR DISMISSAL WITHOUT PREJUDICE

Plaintiff Vehicle IP, LLC and Defendants Garmin International, Inc.,

Garmin USA, Inc., hereby move for an order pursuant to Fed. R. Civ. P. 41(a)(2) and (c) dismissing all claims and counterclaims asserted between them, without prejudice, each party to bear its own costs, expenses, and attorneys' fees.

The Court shall retain jurisdiction of the matter to the extent necessary to enforce the terms and conditions of the Settlement and License Agreement entered into between the parties, the terms of which are incorporated herein by reference.

	Respectfully submitted,
Dated: August 31, 2011	FISH & RICHARDSON P.C.
	By: _/s/ Thomas L. Halkowski Thomas L. Halkowski (I.D. #4099) 222 Delaware Avenue, 17th Floor P.O. Box 1114 Wilmington, DE 19899-1114 (302) 652-5070 halkowski@fr.com Attorney for Plaintiff Vehicle IP LLC
Dated August 31, 2011	RICHARDS, LAYTON & FINGER, PA
	By: <u>/s/ Stephen M. Ferguson</u>
	William J. Wade (I.D. #704)
	Anne Shea Gaza (I.D.#4093)
	Stephen M. Ferguson (I.D. #5167)
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	Attorneys for Defendants
	Garmin International, Inc. and Garmin
	USA, Inc.
SO ORDERED this day of	, 2011.
	
	United States District Judge Leonard P. Stark